

Riva, Steven

From: Riva, Steven
Sent: Friday, February 06, 2015 3:21 PM
To: 'rjstanto@gw.dec.state.ny.us'
Cc: ricky.leone@dec.ny.us
Subject: Expedited Review of SABIC Innovative Plastics US LLC Title V Permit - DEC ID# 4-0122-00007/00719

Bob,

Thank you for the opportunity to review the above referenced permit. We received the proposed permit on 2/06/2015. In accordance with New York State Department of Environmental Conservation title V regulations and 40 C.F.R. § 70.8(c), EPA has 45 days from receipt of the proposed permit and all necessary supporting documentation to object in writing to its issuance. We are writing to notify you that the Agency's 45-day review period will expire on 3/23/15. EPA Region 2 has performed an expedited review of the proposed permit. We have concluded our review and have no comment. Please note that although we are notifying you today that we have no comments, the 60 day period for the public to petition the Administrator to object to the permit begins the day after EPA's full 45 day review period ends. Please note that if the permit is later found to require corrective steps (including, but not limited to, reopening the permit for cause), the expiration of both EPA's review period and the public petition period without EPA objection does not compromise the agency's authority to take such measures. Feel free to contact me at (212) 637-4074 if you have any questions or concerns.

Steve

New York State Department of Environmental Conservation

Division of Environmental Permits, Region 4

1130 North Westcott Road, Schenectady, New York 12306-2014

Phone: (518) 357-2069 • Fax: (518) 357-2460

Website: www.dec.ny.gov



Joe Martens
Commissioner

Certified Mail – Return Receipt Requested
7003 0500 0004 6719 7528

July 14, 2014

16 JUL 2014 RCVD

Mr. Steve Riva
Air Programs Branch
US EPA Region 2
290 Broadway
New York, NY 10007

RE: Proposed Air Title V Permit
DEC #4-01220000700719
Air Title V Permit Sabic Innovative Plastics
Bethlehem, Albany County

Dear Mr. Riva:

This is to advise that the above-referenced permit renewal is available to the US EPA, for the 45 day review. The project underwent public notice on June 9, 2014, which concluded on July 11, 2014. No comments were received.

Please feel free to contact me at (518) 357-2452 if you have any further questions.

Sincerely,

Nancy M Baker
Deputy Regional Permit Administrator
Region 4

cc: Air Resources
file

16 JUL 2014 RCVD

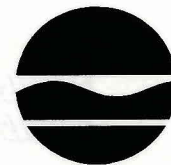
New York State Department of Environmental Conservation

Division of Environmental Permits, Region 4

1130 North Westcott Road, Schenectady, New York 12306-2014

Phone: (518) 357-2069 • Fax: (518) 357-2460

Website: www.dec.ny.gov



Joe Martens
Commissioner

11 FEB 2015 RCVD

February 6, 2015

Mr. Steve Riva
Air Programs Branch
US EPA Region 2
290 Broadway
New York, NY 10007

RE: Proposed Air Title V Permit Modification
DEC #4-0122-00007/00719
SABIC Innovative Plastics US LLC
1 Noryl Avenue, Selkirk, NY
Town of Bethlehem, Albany County

Dear Mr. Riva:

The Department received a Title V Air Permit application for the above referenced facility, which proposes to modify its permit to add additional product lines. We request that you please initiate your 45-day review period.

A *Notice of Complete Application* for the project was published in the *Albany Times Union* newspaper and in the Department's on-line publication the *Environmental Notice Bulletin*. The notice stated that the permit application materials, draft permit and permit review report were available for public review, and that comments on those items would be accepted by the Department through January 23, 2015. The 30-day public review and comment period has now concluded and the department only received one comment. This comment was in objection to the modification due to existing odors produced by the facility. The applicant provided a response to the Department addressing these comments/concerns and after review the Department determined that introduction of new product lines as proposed will not result in any additional, new or significant sources of odors being emitted from the plant. Further, SABIC maintains a documented communication and investigation process in the event of a community odor complaint to identify and mitigate any potential sources. Site incident notifications and incident investigations are documented and tracked for the purpose of continual improvement in eliminating identified root causes. No other issues or concerns were raised.

The Department is hereby providing your agency formal notice that the proposed permit and permit review report are available for your review and comments through the *Air Facility System* and also at the Department's website at the following links:

http://www.dec.ny.gov/dardata/boss/afs/permits/401220000700719_r1_2.pdf
http://www.dec.ny.gov/dardata/boss/afs/permits/prr_401220000700719_r1_2.pdf

Should you have any comments or questions regarding this notice please feel free to contact me by phone at (518) 357-2459 or email james.eldred@dec.ny.gov.

Sincerely,



James J. Eldred
Deputy Regional Permit Administrator

Cc via email: Don Welsted, Air Resources, DEC Region 4
Ricky Leone, Regional Engineer, DEC Region 4
James Cascione, SABIC
Paul Supple, Solid Environmental Engineering

New York State Department of Environmental Conservation

Division of Environmental Permits, Region 4

1130 North Westcott Road, Schenectady, New York 12306-2014

Phone: (518) 357-2069 • Fax: (518) 357-2460

Website: www.dec.ny.gov



Joe Martens
Commissioner

February 6, 2015

Mr. Steve Riva
Air Programs Branch
US EPA Region 2
290 Broadway
New York, NY 10007

RE: Proposed Air Title V Permit Modification
DEC #4-0122-00007/00719
SABIC Innovative Plastics US LLC
1 Noryl Avenue, Selkirk, NY
Town of Bethlehem, Albany County

Dear Mr. Riva:

The Department received a Title V Air Permit application for the above referenced facility, which proposes to modify its permit to add additional product lines. We request that you please initiate your 45-day review period.

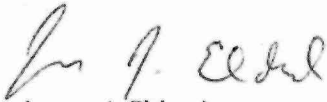
A *Notice of Complete Application* for the project was published in the *Albany Times Union* newspaper and in the Department's on-line publication the *Environmental Notice Bulletin*. The notice stated that the permit application materials, draft permit and permit review report were available for public review, and that comments on those items would be accepted by the Department through January 23, 2015. The 30-day public review and comment period has now concluded and the department only received one comment. This comment was in objection to the modification due to existing odors produced by the facility. The applicant provided a response to the Department addressing these comments/concerns and after review the Department determined that introduction of new product lines as proposed will not result in any additional, new or significant sources of odors being emitted from the plant. Further, SABIC maintains a documented communication and investigation process in the event of a community odor complaint to identify and mitigate any potential sources. Site incident notifications and incident investigations are documented and tracked for the purpose of continual improvement in eliminating identified root causes. No other issues or concerns were raised.

The Department is hereby providing your agency formal notice that the proposed permit and permit review report are available for your review and comments through the *Air Facility System* and also at the Department's website at the following links:

http://www.dec.ny.gov/dardata/boss/afs/permits/401220000700719_r1_2.pdf
http://www.dec.ny.gov/dardata/boss/afs/permits/prr_401220000700719_r1_2.pdf

Should you have any comments or questions regarding this notice please feel free to contact me by phone at (518) 357-2459 or email james.eldred@dec.ny.gov.

Sincerely,



James J. Eldred

Deputy Regional Permit Administrator

Cc via email: Don Welsted, Air Resources, DEC Region 4
Ricky Leone, Regional Engineer, DEC Region 4
James Cascione, SABIC
Paul Supple, Solid Environmental Engineering

Riva, Steven

From: Eldred, James J (DEC) <james.eldred@dec.ny.gov>
Sent: Friday, February 06, 2015 3:17 PM
To: Riva, Steven
Cc: Leone, Ricky (DEC); Welsted, Donald A (DEC)
Subject: FW: SABIC Air Title V Permit Modification - DEC #4-0122-00007/00719; Response to Comments

Dear Mr. Riva,

The Department received only one comment regarding this application as was identified and summarized in the notice of proposed permit that I included in an email to you earlier today. The actual comment received and Department response follow in the email chain below.

Please do not hesitate to contact me should you have questions or require additional information to complete your review. Thank you.

Jim

James Eldred | Deputy Regional Permit Administrator NYSDEC | Region 4 | Environmental Permits
1130 North Westcott Road | Schenectady | NY | 12306
E: james.eldred@dec.ny.gov | P: 518.357.2459

-----Original Message-----

From: Eldred, James J (DEC)
Sent: Friday, February 06, 2015 1:01 PM
To: 'donovan@nycap.rr.com'
Subject: SABIC Air Title V Permit Modification - DEC #4-0122-00007/00719; Response to Comments

Dear Mr. Donovan,

Thank you for submitting comments on this application. Your comments (below in this email chain) were the only comments the Department received and in response we offer the following:

1. Current Action/Modify Permit - Let me first respond to clarify that the proposed changes described in SABIC's application to modify its Air Title V permit do not represent an expansion of operations or the facility but a diversification of the current product offerings the facility produces. Therefore, Department review of the application and draft modified permit address those proposed changes to the facility and any associated emissions and or controls of regulated air pollutants.
2. Compliance - The Department in drafting the modified permit for public comment has made a tentative determination that the proposed changes and permit as modified will meet the statutory and regulatory requirements applicable to the facility operations and emissions. The permit limits and conditions have been established to be protective of the environment and human health and safety as prescribed in the regulations. The facility will be required to monitor and maintain records to document compliance with permit conditions.

3. Odors - In reviewing information provided by the applicant, introduction of the new product lines as proposed is not anticipated to result in any additional, new or significant sources of odors being emitted from the plant. This in part is based on the composition of the new raw materials to be used, in that these would result in minimal vapor generation that could reasonably be released as a nuisance odor. Further, since the project constitutes a diversification of current product offerings and not an increase in overall plant capacity, there will not be an increased potential for nuisance odors to be emitted. While generation of odors is often times inherent in a permitted industrial facility such as SABIC and odors perceived as a nuisance may at times occur, SABIC maintains a documented communication and investigation process in the event of a community odor complaint to identify and mitigate any potential sources. Site incident notifications and incident investigations are documented and tracked for the purpose of continual improvement in eliminating identified root causes. If the community or DEC raises an odor concern in the future, SABIC remains committed to investigate the concern and address any problem found.

Again, thank you for your comments. Should you have any further questions regarding the facility permit or this modification of the permit please do not hesitate to contact me.

Sincerely,
Jim

James Eldred | Deputy Regional Permit Administrator NYSDEC | Region 4 | Environmental Permits
1130 North Westcott Road | Schenectady | NY | 12306
E: james.eldred@dec.ny.gov | P: 518.357.2459

-----Original Message-----

From: Kevin Donovan [mailto:donovan@nycap.rr.com]
Sent: Wednesday, January 07, 2015 11:12 AM
To: dec.sm.DEP.R4
Subject: Sabic plant proposed expansion

Dear DEC:

I am opposed to the expansion of the SABIC plant. They presently do not comply with the Clean Air Act. It is common that strong odors of a chemical nature come from that plant, to such an extent that most of the time I and other bicyclists avoid that route due to the odor. I have also smelled the odor from that plant while picking berries at a farm on Meads Lane, and that is about a mile away as the crow flies.

After SABIC shows that they can successfully eliminate these odors, then their request should be considered.

Thank you for considering this comment.

Kevin Donovan
7 Pinetree Drive
Delmar, NY 12054

donovan@nycap.rr.com